

# **EXHIBIT G**

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**From:** Cole-Chu, Hannah <HColeChu@outtengolden.com>  
**Sent:** Thursday, September 8, 2022 5:03 PM  
**To:** Philion, Rachel S.; Bloom, Elise M.; Goldberg, Pinchos; Martin, Allison L.; Batten, Mark W.; Reiter, Nicholas M.  
**Cc:** Bloomberg Plaintiffs Attorneys  
**Subject:** Wood v. Blomberg: Plaintiffs' TAC

***This email originated from outside the Firm.***

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Counsel,

We are writing to let you know that we plan to modify one aspect of the relief we are seeking in our motion for leave to file a Third Amended Complaint. Specifically, we intend to ask the Court to permit Plaintiffs to keep Plaintiff Wheatley-Diaz as a PAGA class representative (instead of converting her into a Named Plaintiff) in addition to naming Plaintiffs Ceppos and Coker as California class and PAGA representatives. *Hargrove* supports our position that substitution of Plaintiffs Ceppos and Coker is appropriate here, given they meet the PAGA requirements, their claims relate back, and the Campaign cannot claim any prejudice. However, to efficiently resolve one disputed issue in the briefing, and eliminate any doubt that the PAGA claims can proceed in this case, we propose simply keeping Plaintiff Wheatley-Diaz as a PAGA representative. We plan to request this in the supplemental letter due on Tuesday.

Please advise whether you consent. We will send you the section of our letter to the Court on this point as soon as we have it (likely tomorrow) and are available to meet and confer tomorrow or Monday. We propose scheduling a time for that conferral now so we can hold a slot. Would 5pm on Monday work, assuming the parties have completed Mr. Kanninen's deposition by that time?

Regards,

Hannah



**Hannah Cole-Chu | Associate**

Pronouns: she/her/hers

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